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THIOESTERS ASSOCIATION

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86HQ-0805-16155

August 15, 2005

Submitted via Fedex

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
1201 Pennsylvania Avenue, NW
Washington, DC 20460-0001



Contain NO CBI

Re: TSCA Section 8(e) Submission
2-ETHYLHEXYL MERCAPTOACETATE (CAS No. 7659-86-1)

Dear Sir/Madam:

Hunt Management Services, LLC is submitting information on behalf of the Thioesters Association to the United States Environmental Protection Agency (USEPA) pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA). A recently received draft report provides preliminary data from a Reproduction/Developmental Toxicity Screening Study in Rats (OECD 421) with 2-ethylhexylmercaptoacetate (CAS Number 7659-86-1; EHMA), also known as 2-ethylhexylthioglycolate [EHTG]. This research was sponsored under the International Council of Chemical Associations' (ICCA) Program as part of a category approach.

In this study, rats were exposed by oral gavage to 10, 50, or 150 mg/kg/day EHTG. Below is a list of the effects observed in the 150 mg/kg/day dose group.

- 2 females found dead at gestation day 21
- 1 female euthanized in extremis on gestation day 22 with signs of dystocia
- 1 female with total litter loss
- Decreased pup size
- Decreased pup viability (due to loss of 1 litter)
- Decreased litter size (due to loss of 1 litter)
- Increased incidence and severity of vaginal and cervical mucification compared to control group on day 4 of lactation (mucification also noted in animals that died on gestation day 21 and 22)



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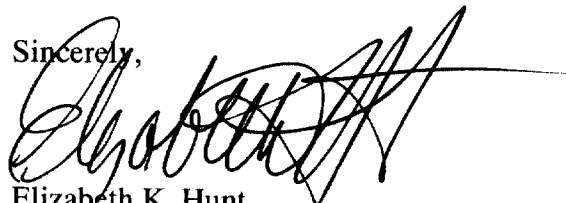
TSCA Section 8(e)
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At doses of 10 and 50 mg/kg/day no treatment-related adverse effects were observed.

This submission is being made on behalf of the members of the Thioester Association [Group 2B], 2-ethylhexylmercaptoacetate is part of a category with the following member companies: Arkema Inc.; Bruno Bock Chemische Fabrik GmbH & Co KG; Chemtura Corporation (formerly Crompton Corporation); Dow Chemical Company; and Rohm and Haas Company. The parties of this international consortium assert that this notice does not involve effects in humans and nothing in this letter is considered confidential business information [CBI] by the Thioesters Association or its members.

If you have any questions regarding this submission please contact me at (540) 751-2093 or via e-mail at ehunt@adelphia.net.

Sincerely,



Elizabeth K. Hunt
Executive Director
Hunt Management Services, LLC

cc:

Arkema Inc.
Bruno Bock Chemische Fabrik GmbH & Co KG
Chemtura Corporation (Crompton Corporation)
Dow Chemical Company
Rohm and Haas Company